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5 | Attorney for Plaintiff  
AF Holdings, L.L.C.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

10 AF HOLDINGS, L.L.C., a St. Kitts and Nevis limited liability company,

CASE NO.: 2:12-CV-02144-PHX-GMS

11 Plaintiff.

12 | V.

12 DAVID HARRIS.

14 | Defendant.

**PLAINTIFF'S NOTICE OF  
ALLEGATIONS RAISED IN  
ANOTHER JURISDICTION**

## **NOTICE OF ALLEGATIONS**

17 Plaintiff AF Holdings, L.L.C. (“Plaintiff”), through its undersigned counsel, hereby notifies  
18 the Court of allegations of forgery that were made during a hearing in a matter pending before the  
19 U.S. District Court for the Central District of California. *Ingenuity13, L.L.C. v. John Doe*, No. 2:12-  
20 cv-08333-OWD-JC (C.D. Cal. Mar. 11, 2013).

21 On March 11, 2013, an individual by the name of Alan Cooper alleged that his signature was  
22 forged on two separate agreements assigning the right of various copyrighted works to Plaintiff,  
23 including the assignment at issued in this matter. *See*, ECF No. 1-2 at 2. Plaintiff categorically  
24 denies Mr. Cooper's allegations, which arise nearly two years after certain of the alleged conduct

1 occurred. Moreover, Mr. Cooper has a pecuniary interest in his allegations by virtue of a lawsuit he  
 2 filed against Plaintiff. *Cooper v. Steele, et al.*, No. 27-CV-13-3463 (Minn. Dist. Ct., Hennepin Cty.,  
 3 2013).

4 Even if Mr. Cooper's allegations were true—which they are not—Plaintiff's assignments,  
 5 including the assignment at issue in the instant action, remain valid. The formal requirements of a  
 6 copyright assignment are “quite simple”: a *writing* signed by the *assignor*. 17 U.S.C. § 204; *Effects*  
 7 *Associates, Inc. v. Cohen*, 908 F.2d 555, 557 (9th Cir. 1990) (“The rule is really quite simple: If the  
 8 copyright holder agrees to transfer ownership to another party, that party must get the copyright  
 9 holder to sign a piece of paper saying so. It doesn't have to be the Magna Charta; a one-line pro  
 10 forma statement will do.”); *See also Order, AF Holdings LLC v. Does 1-96*, No. 11-cv-3335-JSC  
 11 (N.D. Cal. Nov. 22, 2011), ECF No. 29 at 5 n.1 (“The written copyright assignment recites that it is  
 12 between the original copyright owner, Heartbreaker Films, and Plaintiff here, AF Holdings, LLC....  
 13 As the law requires only that the assignment be signed by the assignor and not the assignee, this  
 14 inconsistency does not prevent a *prima facie* showing of copyright ownership.”) (internal citations  
 15 omitted).

16 Mr. Cooper's allegations relate to the *assignee*, not the assignor. The assignment at issue in  
 17 this action satisfies the Copyright Act's formal requirements. It is a writing signed by the assignor.  
 18 Plaintiff's rights in the copyrighted work in this action were transferred when the assignor executed  
 19 the assignment.

20 Plaintiff is treating Mr. Cooper's allegations with utmost seriousness and is investigating  
 21 their substance. Because Mr. Cooper's allegations relate to the assignment agreement at issue in the  
 22 instant litigation, and in the spirit of complete candor toward a tribunal, Plaintiff respectfully brings  
 23 the matter to the Court's attention.

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2 Dated this 20<sup>th</sup> day of March, 2013

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6 By: /s/ Steven James Goodhue

7 Steven James Goodhue (#029288)

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10 Scottsdale, AZ 85260

11 *Attorney for Plaintiff*

12 *AF Holdings, L.L.C.*

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I hereby certify that on March 20, 2013, I electronically filed the foregoing with the Clerk of the Court for filing and uploading to the CM-ECF system which will send notifications of such filing to all parties of record.

A COPY of the foregoing was mailed (or served via electronic notification if indicated by an “\*”) on March 20, 2013, to:

Honorable G. Murray Snow \*(snow\_chambers@azd.uscourts.gov)

U.S. District Court

Sandra Day O'Connor Courthouse Suite 324

401 West Washington Street, SPC 82

Phoenix, Arizona 85003-7550

David Harris\* (troll.assassins@cyber-wizards.com)

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/s/ Steven James Goodhue